

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

WILLIAM PERSICHETTI, *on behalf* :
of himself and all others similarly :
situated, :

Plaintiff, :

V. :

T-MOBILE USA, INC, :

Defendant. :

Civil Action No. 1:19-CV-02424-JPB

**UNOPPOSED MOTION TO EXTEND TIME TO FILE
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

COMES NOW Plaintiff, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and this Court's Local Rule 23.1B, on behalf of himself and all others similarly situated and based upon the attached brief and materials of record, and respectfully submits his Motion to Extend Time to File Plaintiff's Motion for Class Certification. Defendant has confirmed by email that it does not oppose the relief requested by this motion.

Plaintiff respectfully requests this Court to extend his to file his Motion for Class Certification until six months after the opening of discovery as agreed upon by the parties in the Joint Preliminary Plan. Doc. 17, p. 7.

Respectfully submitted,

SKAAR & FEAGLE, LLP

by: /s/ Justin T. Holcombe
Justin T. Holcombe
Georgia Bar No. 552100
jholcombe@skaarandfeagle.com
Kris Skaar
Georgia Bar No. 649610
kskaar@skaarandfeagle.com
133 Mirramont Lake Drive
Woodstock, GA 30189
770 / 427-5600
404 / 601-1855 fax

James M. Feagle
Georgia Bar No. 256916
jfeagle@skaarandfeagle.com
2374 Main Street
Suite B
Tucker, GA 30084
404 / 373-1970
404 / 601-1855 fax

Daniel C. Girard (*pro hac vice*)
dgirard@girardsharp.com
Simon S. Grille (*pro hac vice*)
sgrille@girardsharp.com
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, California 94108
Tel: 415-981-4800
Fax: 415-981-4846

*Counsel for Plaintiff and the Proposed
Class*